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7 Attorneys for Plaintiff  
United States of America

8 UNITED STATES DISTRICT COURT

9 SOUTHERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA, ) Criminal Case No. 07CR1008-LAB  
11 Plaintiff, ) Date: July 7, 2008  
12 v. ) Time: 2:00 p.m.  
13 RUDOLFO TORREZ, ) Place: Courtroom 9  
14 Defendant. )  
15 ) **UNITED STATES' NOTICE OF MOTIONS**  
16 ) **AND MOTIONS IN LIMINE TO:**  
17 )  
18 ) (A) EXCLUDE WITNESSES;  
19 ) (B) ADMIT A-FILE DOCUMENTS;  
20 ) (C) ADMIT CERTIFICATE OF NON-  
EXISTENCE;  
21 ) (D) ADMIT TAPE AND TRANSCRIPT OF  
DEPORTATION HEARING;  
22 ) (E) ADMIT CERTIFIED TRANSCRIPTS  
23 ) (F) ADMIT EXPERT TESTIMONY;  
24 ) (G) ADMIT 404(b) AND 609 EVIDENCE;  
25 ) (H) PROHIBIT COLLATERAL ATTACK  
OF DEFENDANT'S DEPORTATION;  
26 ) (I) PROHIBIT CERTAIN TYPES OF  
REFERENCES BY DEFENDANT;  
27 ) (J) PRECLUDE EXPERT TESTIMONY  
BY DEFENSE;  
28 ) (K) PRECLUDE ARGUMENT  
REGARDING WARNING;  
 ) (L) PRECLUDE ARGUMENT OF  
DURESS AND NECESSITY;  
 ) (M) PRECLUDE SELF-SERVING  
HEARSAY; AND  
 ) (N) RENEWED MOTION FOR  
RECIPROCAL DISCOVERY

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1 PLEASE TAKE NOTICE that on July 7, 2008, at 2:00 p.m., or as soon thereafter as counsel may  
2 be heard, plaintiff, UNITED STATES OF AMERICA, by and through its counsel, Karen P. Hewitt,  
3 United States Attorney, and Joseph J.M. Orabona, Assistant United States Attorney, will move the Court  
4 to enter an order granting the following motions in limine to:

1. Exclude All Witnesses Except Case Agent;
2. Admit A-File Documents And Testimony by the A-File Custodian;
3. Admit Certificate Of Non-Existence;
4. Admit Audiotape And Transcript Of Deportation Hearing;
5. Admit Certified Transcripts of Prior Plea Colloquy;
6. Admit Expert Testimony;
7. Admit 404(b) and 609 Evidence;
8. Prohibit Collateral Attack Of Deportation;
9. Prohibit Certain Types of References by Defendant;
10. Preclude Expert Testimony By Defense
11. Preclude Argument Regarding Warning;
12. Preclude Argument Regarding Duress And Necessity;
13. Preclude Self-Serving Hearsay; and
14. Renewed Motion For Reciprocal Discovery

19 The motions in limine noted above are based on the files and records of this case, together with  
20 the a separately captioned statement of facts and memorandum of points and authorities.

21 || DATED: June 16, 2008

Respectfully submitted,

KAREN P. HEWITT  
United States Attorney

/s/ *Joseph J.M. Orabona*  
JOSEPH J.M. ORABONA  
Assistant United States Attorney